

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	Chapter 11
)	
CIRCUIT CITY STORES, INC., et al.,)	Case No. 08-35653-KRH
9950 Mayland Drive)	
Richmond, Virginia 23233)	(Jointly Administered)
Tax ID: 54-0493875)	
)	
Debtors.)	

**NOTICE OF MOTION AND MEMORANDUM IN SUPPORT
THEREOF AND NOTICE OF HEARING THEREON**

IMCC Sunland, L.L.C. (“Inland”), by and through its undersigned counsel has filed with the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division (the “Court”), a *Motion to Compel Liquidating Trust to (I) Comply with Certain Terms of the Second Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors in Possession and its Official Committee of Creditors Holding General Unsecured Claims, and (II) Recognize and Effectuate Transfers of Claims other than for Security and Memorandum in Support Thereof* (the “Motion”). A copy of the Motion may be obtained from the undersigned counsel to Inland upon request.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the Motion, or if you want the court to consider your views on the Motion, then not later than 7 days prior to the hearing date set forth below you or your attorney must:

 X File with the court, at the address shown below, a written response pursuant to Local Bankruptcy Rule 9013-1(H). If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

Augustus C. Epps, Jr., Esquire (VSB 13254)
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Counsel for IMCC Sunland, L.L.C.

Clerk of Court
United States Bankruptcy Court
701 East Broad Street, Suite 4000
Richmond, Virginia 23219

You must also mail a copy to:

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Attorneys for IMCC Sunland, L.L.C.

X Attend the hearing on the Motion scheduled to be held on April 14, 2011 at 2:00 p.m. at the United States Bankruptcy Court, 701 East Broad Street, Suite 5000, Richmond, Virginia 23219.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting that relief.

Dated: March 15, 2011

CHRISTIAN & BARTON, LLP

By: /s/ Jennifer M. McLemore
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Attorneys for IMCC Sunland, L.L.C.

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of March, 2011, a true and correct copy of the foregoing *Notice of Motion and Memorandum in Support Thereof and Notice of Hearing Thereon* was served by electronic mail to all parties receiving service through the Court's ECF system.

/s/ Jennifer M. McLemore
Jennifer M. McLemore

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